## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMKOR TECHNOLOGY, INC., A Delaware Corporation,

Plaintiff,

v.

ALCATEL MICROELECTRONICS N.V., a : Belgian Corporation, ALCATEL BUSINESS : SYSTEMS, a French Corporation, and : ASSURANCES GENERALES DE FRANCE IART, : a French Corporation, :

Defendants.

CIVIL ACTION NO. 02-3156

## PLAINTIFF'S RESPONSE AND EXPEDITED MOTION TO STAY CONSIDERATION OF DEFENDANTS ALCATEL BUSINESS SYSTEMS AND ASSURANCES GENERALES DE FRANCE IART'S MOTION TO DISMISS

For the reasons set forth in the attached supporting Memorandum of Law, along with the Affidavit of David S. Steuer, Esquire, Plaintiff Amkor Technology, Inc. moves this Court for an entry to stay consideration of Defendants Alcatel Business Systems and Assurances Generales De France Iart's Motion to Dismiss and to permit Plaintiff Amkor Technology, Inc. to take jurisdictional discovery.

Respectfully submitted,

## DUANE MORRIS LLP

By:

Patrick J. Loftus One Liberty Place Philadelphia, PA 19103-7396 (215) 979-1367

Attorneys for Plaintiff AMKOR TECHNOLOGY, INC.

Dated: October 2, 2002

PH2\677060.1